

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

M.P., a minor, by and through, Jennifer Pinckney,  
as Parent, Natural Guardian, and Next Friend,

*Plaintiff*

v.

Meta Platforms, Inc. (f/k/a Facebook, Inc., a Delaware corporation; Facebook Holding, LLC; Facebook Payments, Inc; Facebook Technologies, LLC; Instagram, LLC; Siculus, Inc; Internet Research Agency, LLC (a/k/a Mediasintez LLC a/k/a Glavset LLC a/k/a Mixinfo LLC A/K/A Azimut LLC a/k/a Novinfo LLC); Concord Management and Consulting LLC; Concord Catering, & Yevgeniy Viktorovich Prigozhin

*Defendants*

**RULE 26.01 ANSWERS TO  
INTERROGATORIES**

Case No.: 2:22-cv-3830-RMG

The Plaintiff herein, by and through their undersigned counsel of record, hereby answer the local Rule 26.01 Interrogatories of the court as follows:

(A) State the full name, address and telephone number of all persons or legal entities who may have subrogation interest in each claim and state the basis and extent of said interest.

**ANSWER: None known at this time.**

(B) As to each claim, state whether it should be tried jury or nonjury and why.

**ANSWER: Plaintiff is informed and believes it is entitled to a trial by jury.**

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party

owns ten percent or more of the outstanding shares.

**ANSWER: Party submitting these responses is not publicly owned.**

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**ANSWER: Jurisdiction is proper in this Court pursuant to 28 U.S.C. § 1332(a) as complete diversity exists between Plaintiff, a South Carolina domiciliary and resident, and Defendants, who are Russian corporations and individual(s) (non-U.S. entities and non-citizens residing abroad are considered diverse from Plaintiff for purposes of this Court's jurisdiction) and numerous Delaware corporations having their principal places of business in California.**

(E) Is the action related in whole or part to any other matter filed in this District, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**ANSWER: There is no case that is related that this plaintiff is aware of in this District.**

HODGE & LANGLEY LAW FIRM, PC

s/T. Ryan Langley

**T. Ryan Langley**

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Attorney for Plaintiff

Dated: November 2, 2022  
Spartanburg, SC